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UNITED STATES BANKRUPTCY COURT  
 SOUTHERN DISTRICT OF NEW YORK

In re Bayou Group, LLC, et al.	)	
	)	Chapter 11
	)	Case No. 06-22306(ASH)
Dr. Samuel E. Christen, Appellant	)	Jointly Administered
v.	)	
<u>Bayou Group, LLC, et al., Appellees</u>	)	

DESIGNATION OF CONTENTS FOR INCLUSION IN RECORD ON APPEAL AND  
 STATEMENT OF ISSUES ON APPEAL

Designation of Record on Appeal:

1. “Application for Order Shortening Notice of Hearing on the Motion of the Debtors and Debtors-In-Possession Pursuant to Federal Rule of Bankruptcy Procedure 9019 for an Order Authorizing and Approving Settlement Agreement Between the Debtors and the Tom and Nancy Juda Living Trust”, filed by Dechert LLP and dated April 13, 2007 (Docket No. 373).
2. “Motion of the Debtors and Debtors-In-Possession Pursuant to Federal Rule of Bankruptcy Procedure 9019 for an Order Authorizing and Approving Settlement Agreement between the Debtors and the Tom and Nancy Juda Living Trust” filed by Dechert LLP and dated April 13, 2007 (Docket No. 376).
3. “Bayou Investor Defendants’ Objection to Motion of the Debtors and Debtors-In-Possession Pursuant to Federal Rule of Bankruptcy Procedure 9019 for an Order Authorizing and Approving Settlement Agreement between the Debtors and the Tom and Nancy Juda Living Trust” filed by Sonnenschein Nash & Rosenthal LLP and dated April 20, 2007 (Docket No. 387).

4. "Joinder by (I) Peter Haje IRA and Peter Haje, et al., to Objection by Sonnenschein Defendants to Debtors' Motion for an Order Authorizing and Approving a Settlement Agreement between the Debtors and the Tom and Nancy Juda Living Trust" filed by Fried, Frank, Harris, Shriver & Jacobson LLP and dated April 20, 2007 (Docket No. 389).

5. "Debtors Response to Objections to Motion Pursuant to Federal Rule of Bankruptcy Procedure 9019 for an Order Authorizing and Approving Settlement Agreement between the Debtors and the Tom and Nancy Juda Living Trust" filed by Dechert LLP and dated April 23, 2007 (Docket No. 391).

6. "Revised Notice of Agenda on Matters Scheduled for Hearing on April 23, 2007 at 3:00 p.m. in Courtroom 701, One Bowling Green" filed by Dechert LLP and dated April 23, 2007 (Docket No. 392).

7. "Notice of Presentment of Order Authorizing and Approving Settlement Agreement between the Debtors and the Tom and Nancy Juda Living Trust" filed by Dechert LLP and dated May 29, 2007 (Docket No. 423).

8. "Order Authorizing and Approving Settlement Agreement between the Debtors and the Tom and Nancy Juda Living Trust" signed by Judge Hardin and dated June 4, 2007.

9. "Transcript of Hearing before the Honorable Adlai S. Hardin, Jr. United States Bankruptcy Judge" filed by TypeWrite Word Processing Service (Docket No. 404).

Statement of Issues on Appeal:

1. Did the Bankruptcy Court have authority under the Bankruptcy Code to approve a settlement fixing the priority of a claim prior to and not in the context of a plan of reorganization?

2. If the Bankruptcy Court had such authority, should it have exercised it in light of the peculiarities of this bankruptcy proceeding?

Dated: June 25, 2007

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